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**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

**DONALD GREENSPAN**, as Administrator of  
the **ESTATE OF RUTH J. GREENSPAN**,  
deceased

Plaintiff,

-vs-

**PLATINUM HEALTHCARE GROUP, LLC;  
PLATINUM HEALTH AT WESTGATE,  
LLC, d/b/a, WESTGATE HILLS  
REHABILITATION AND NURSING  
CENTER; APEX GLOBAL SOLUTIONS,  
LLC ; APEX HEALTHCARE PARTNERS,  
LLC; VINTAGE HEALTHCARE, LLC;  
PLATINUM PA HOLDINGS, LLC;  
2050 OLD WEST CHESTER PIKE, LLC;  
and JACOB KARMEL**

Defendants.

Civil Action No. 20-5874

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**CERTIFICATE OF MERIT AS TO DEFENDANT**  
**PLATINUM HEALTH AT WESTGATE, LLC, d/b/a, WESTGATE HILLS**  
**REHABILITATION AND NURSING CENTER**

x an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

x the claim that this defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to

conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

- ☐ expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this defendant.

**MURRAY, STONE & WILSON, PLLC**  
*Attorneys for Plaintiff*

Date: February 2, 2021

By: /s/ William P. Murray, III  
William P. Murray, III